

CIVIL COVER SHEET

JS44

(Rev. 12/07)

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THIS FORM.)

I (a) PLAINTIFFS

DEFENDANTS

STEPHANIE KOLOKITHAS GEORGOPANOS

LOWE'S HOME CENTERS, LLC

(b) COUNTY OF RESIDENCES OF FIRST LISTED PLAINTIFF **PA**
(EXCEPT IN U.S. PLAINTIFF CASES)COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT **NC**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

ATTORNEYS (IF KNOWN)

Keith J. Cohen, Esquire
LAW OFFICES OF KEITH J. COHEN, ESQUIRE, P.C.
585 Skippack Pike, Suite 200
Blue Bell, PA 19422
(267) 708-7700

JENNIFER M. HERRMANN, ESQUIRE
MINTZER, SAROWITZ, ZERIS, LEDVA &
MEYERS, LLP
Centre Square, West Tower
1500 Market Street, Suite 4100
Philadelphia, PA 19102
(215) 735-7200

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)

(For Diversity Cases Only)

☐ 1 U.S. Government
Plaintiff

FOR PLAINTIFF AND ONE BOX FOR DEFENDANT

☐ 3 Federal Question
(U.S. Government Not a Party)

☐ 2 U.S. Government

☒ 4 Diversity
(Indicate Citizenship of

Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX)

PTF DEF
Citizen of This State ☒ 1 ☐ 1
of Business In This State
Citizen of Another State ☐ 2 ☒ 2
of Business In Another State
Citizen or Subject of a ☐ 3 ☐ 3
Foreign Country

PTF DEF
Incorporated or Principal Place ☐ 4 ☐ 4
Incorporated and Principal Place ☐ 5 ☐ 5
Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (PLACE AN X IN ONE BOX ONLY)

CONTRACT

- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)
- ☐ 153 Recovery of Overpayment of Veterans Benefits
- ☐ 160 Stockholders Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY

- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS**PERSONAL INJURY**

- ☐ 310 Airplane
- ☐ 315 Airplane Product
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☒ 360 Other Personal Injury

PERSONAL INJURY

- ☐ 362 Personal Injury - Med Malpractice
- ☐ 365 Personal Injury -- Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY

- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS

- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/Accommodation
- ☐ 444 Welfare
- ☐ 440 Other Civil Rights

PRISONER PETITIONS

- ☐ 510 Motion to Vacate Sentence
- ☐ Habeas Corpus
- ☐ 530 General
- ☐ 535 Death Penalty
- ☐ 540 Mandamus & Other
- ☐ Civil Rights
- ☐ 555 Prison Conditions

FORFEITURE/PENALTY

- ☐ 610 Agriculture
- ☐ 620 Other Food & Drug
- ☐ 625 Drug Related Seizure of property 21 USC 881
- ☐ 630 Liquor Laws
- ☐ 640 R R & Truck
- ☐ 650 Airline Regs
- ☐ 660 Occupational Safety/Health
- ☐ 690 Other

LABOR

- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 730 Labor/Mgmt. Reporting & Disclosure Act
- ☐ 740 Railway Labor Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Empl. Ret. Inc. Security Act

IMMIGRATION

- ☐ 462 Naturalization Application
- ☐ 463 Habeas Corpus - Alien Detainee
- ☐ 465 Other Immigration Actions

BANKRUPTCY

- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS

- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark
- ☐ 861 hia (1395FF)
- ☐ 862 Black Lung (923)
- ☐ 863 dlwcd/dlww (405(g))
- ☐ 864 SSID Title XVI
- ☐ 864 RSI (405(g))

SOCIAL SECURITY**FEDERAL TAX SUITS**

- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - Third Party 26 USC 7609

OTHER STATUTES

- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 810 Selective Service
- ☐ 850 Securities/Commodities/Exchange
- ☐ 875 Customer Challenge 12 USC 3410zation Act
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 892 Economic Stabilization Act
- ☐ 893 Environmental Matters
- ☐ 894 Energy Allocation Act
- ☐ 895 Freedom of Information Act
- ☐ 900 Appeal of Fee Determination Under Equal Access to Justice
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN

(PLACE AN X IN ONE BOX ONLY)

☐ 1. Original Proceeding

☒ 2. Removed from State Court

☐ 3. Remanded from Appellate Court

☐ 4. Reinstated or Reopened

 Transferred from
☐ 5 another district (specify)

☐ 6 Multidistrict Litigation

 Appeal to District
☐ 7 Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING (Do not cite jurisdictional statutes unless diversity):

Brief description of cause: Premises Liability - 28 U.S.C. §1332(A)(1) & 28 U.S.C. §1441(A)

VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23

DEMAND

Check YES only if demanded in complaint:

JURY DEMAND: ☒ YES ☐ NO

VIII. RELATED CASE(S)

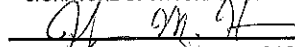
(See Instructions):

IF ANY

Judge

Docket Number

SIGNATURE OF ATTORNEY OF RECORD


JENNIFER M. HERRMANN, ESQUIRE

DATE: March 4, 2016

FOR OFFICE USE ONLY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

STEPHANIE KOLOKITHAS GEORGOPANOS		CIVIL ACTION
vs.		
LOWE'S HOME CENTERS, LLC		NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus -- Cases brought under 28 U.S.C. 2241 through 2255.

()
- (b) Social Security -- Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits.

()
- (c) Arbitration -- Cases required to be designated for arbitration under Local Civil Rule 53.2.

(X)
- (d) Asbestos -- Cases involving claims for personal injury or property damage from exposure to asbestos.

()
- (e) Special Management -- Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)

()
- (f) Standard Management -- Cases that do not fall into any one of the other tracks.

()

DATE: March 4, 2016


 JENNIFER M. HERRMANN, ESQUIRE
 Attorney-at-Law

Attorney ID #315453

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA - DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1427 Knox Road, Wynnewood, PA 19096

Address of Defendant: 1605 Curtis Bridge Road, Wilkesboro, North Carolina 28697

Place of Accident, Incident or Transaction: 1250 Cornerstone Blvd., Downingtown, PA 19018

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE IF ANY

Case Number: _____ Judge: _____ Date Terminated: _____

Civil Cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights Case filed by the same individual? Yes ☐ No ☒

CIVIL: (Place X in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ 9 Indemnity Contract, Marine Contract, and All
2. ☐ 9 FELA
3. ☐ 9 Jones Act-Personal Injury
4. ☐ 9 Antitrust
5. ☐ 9 Patent
6. ☐ 9 Labor-Management Relations
7. ☐ 9 Civil Rights
8. ☐ 9 Habeas Corpus
9. ☐ 9 Securities Act(s) Cases
10. ☐ 9 Social Security Review Cases
11. ☐ 9 All Other Federal Question Cases
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ 9 Insurance Contract and Other Contracts
2. ☐ 9 Airplane Personal Injury
3. ☐ 9 Assault, Defamation
4. ☐ 9 Marine Personal Injury
5. ☐ 9 Motor Vehicle Personal Injury
6. ☒ 9 Other Personal Injury (Please specify) - Slip and fall
7. ☐ 9 Products Liability
8. ☐ 9 Products Liability - Asbestos
9. ☐ 9 All other Diversity Cases
(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, JENNIFER M. HERRMANN, ESQUIRE, counsel of record do hereby certify:

9 Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
9 Relief other than monetary damages is sought.

DATE: March 4, 2016

JENNIFER M. HERRMANN, ESQUIRE

Attorney-at-Law

Attorney ID # 315453

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: March 4, 2016

JENNIFER M. HERRMANN, ESQUIRE

Attorney-at-Law

Attorney ID # 315453

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STEPHANIE KOLOKITHAS
GEORGOPANOS

vs.

LOWE'S HOME CENTERS, LLC

CIVIL ACTION

NO.

PETITION FOR REMOVAL

TO: THE HONORABLE JUDGES OF THE DISTRICT COURT FOR
EASTERN DISTRICT OF PENNSYLVANIA

As removing party Defendant, LOWE'S HOME CENTERS, LLC, files this Notice of Removal of the above-captioned matter from the Court of Common Pleas, Philadelphia County, the Court in which it is now pending to the United States District Court for the Eastern District of Pennsylvania. In support thereof, Defendant avers as follows:

1. This action was commenced by way of Complaint filed in the Court of Common Pleas, Philadelphia County on or about February 2, 2016, and docketed as No. 160200350. (A true and correct copy of Plaintiff's Complaint is attached hereto and marked as Exhibit "A").

2. By Stipulation filed on 2/26/2016, the name of the Defendant, Lowe's Home Centers, Inc. was removed from the caption and Complaint and replaced with "Lowe's Home Centers, LLC." (A true and correct copy of said Stipulation is attached hereto and marked as Exhibit "B").

3. This notice is timely, having been filed within thirty (30) days of Plaintiff having filed the Complaint.

4. Defendant was serve with the Complaint on February 4, 2016. (A true and correct copy of the Affidavit of Service is attached hereto and marked as Exhibit "C").

5. At the time this action was commenced and continuing to the present, Defendant, LOWE'S HOME CENTERS, LLC, is a limited liability company organized under the laws of the State of North Carolina, having its principal place of business in North Carolina, and operating stores in Pennsylvania.

6. Based upon the allegations in the Complaint, at the time this action was commenced and continuing to the present, Plaintiff, Stephanie Kolokithas Georgopanos, is a citizen of the Commonwealth of Pennsylvania.

7. Moving Defendant believes and therefore avers that the amount in controversy, based upon the allegations in the Complaint, will exceed the jurisdictional amounts required for jurisdiction to exist in District Court, exclusive of interest and costs.


8. This action is removable from State Court to this Court based upon diversity of citizenship pursuant to 28 U.S.C. §1332(a)(1) and 28 U.S.C. §1441(a).

9. This Court has full and exclusive jurisdiction over this.

WHEREFORE, moving Defendant, LOWE'S HOME CENTERS, LLC, respectfully requests that the above-captioned action be removed from the Court of Common Pleas, Philadelphia County to the District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: 
JENNIFER M. HERRMANN, ESQUIRE
Attorney for Defendant, LOWE'S HOME CENTERS,
LLC
Centre Square, West Tower
1500 Market Street
Suite 4100
Philadelphia, PA 19102
(215) 735-7200
MSZL&M File No. 003830.000085

CERTIFICATE OF SERVICE

I, JENNIFER M. HERRMANN, ESQUIRE, do hereby certify that a true and correct copy of the within **PETITION FOR REMOVAL** was forwarded by First Class Mail, postage pre-paid on the 4th day of March, 2016 as follows:

Keith J. Cohen, Esquire
LAW OFFICES OF KEITH J. COHEN, ESQUIRE, P.C.
585 Skippack Pike, Suite 200
Blue Bell, PA 19422


JENNIFER M. HERRMANN, ESQUIRE

2016-02-12 09:50

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Court of Common Pleas of Philadelphia County Trial Division Civil Cover Sheet		For Prothonotary Use Only (Docket Number)	
PLAINTIFF'S NAME STEPHANIE KOLOKITHAS GEORGOPANOS		FEBRUARY 2016 E-Filing Number: 1602004972 000350	
PLAINTIFF'S ADDRESS 1427 KNOX ROAD WYNNEWOOD PA 19096		DEFENDANT'S NAME LOWE'S HOME CENTERS, LLC	
PLAINTIFF'S NAME		DEFENDANT'S ADDRESS 2106 SOUTH COLUMBUS BOULEVARD PHILADELPHIA PA 19148	
PLAINTIFF'S ADDRESS		DEFENDANT'S NAME LOWE'S HOME CENTERS, INC.	
PLAINTIFF'S NAME		DEFENDANT'S ADDRESS HIGHWAY 268 EAST - EAST DOCK NORTH WILKESBORO NC 28659	
PLAINTIFF'S ADDRESS		DEFENDANT'S NAME	
TOTAL NUMBER OF PLAINTIFFS 1		TOTAL NUMBER OF DEFENDANTS 2	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00		COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
COURT PROGRAMS <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other:		<input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition <input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival	
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		FILED PRO PROTHY FEB 02 2016 M. BRYANT	
		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>STEPHANIE KOLOKITHAS GEORGOPANOS</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY KEITH J. COHEN		ADDRESS OFFICE COURT AT BLUE BELL 585 SKIPPAK PIKE, SUITE 200 BLUE BELL PA 19422	
PHONE NUMBER (267) 708-7700	FAX NUMBER (267) 708-7701		
SUPREME COURT IDENTIFICATION NO. 43561		E-MAIL ADDRESS kjc@keithcohenlaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY KEITH COHEN		DATE SUBMITTED Tuesday, February 02, 2016, 12:30 pm	

FINAL (Clerk)

EXHIBIT

A

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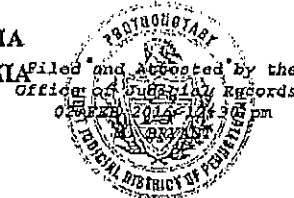
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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA



STEPHANIE KOLOKITHAS

GEORGOPANOS:

Plaintiff,

CASE NO.

v.

LOWE'S HOME CENTERS, LLC

and

CIVIL ACTION AT LAW

LOWE'S HOME CENTERS, INC.

Defendants.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

10-284

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hacer falta aparecer una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademais, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio, vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

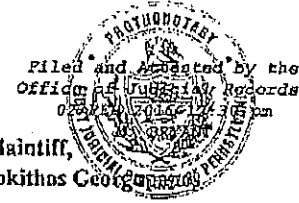
Case ID: 160200350

2016-02-12 09:50

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Law Offices of Keith J. Cohen, Esquire, P.C.
 By: Keith J. Cohen, Esquire
 Attorney I. D. No. 43561
 585 Skippack Pike, Suite 200
 Blue Bell, PA 19422
 (267) 708-7700
 EMAIL: kjc@keithcohenlaw.com



Attorney for Plaintiff,
 Stephanie Kolokithas Georgopoulos

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA

STEPHANIE KOLOKITHAS GEORGOPANOS
 1427 Knox Road
 Wynnewood, PA 19096

Plaintiff,

v.

LOWE'S HOME CENTERS, LLC
 2106 South Columbus Boulevard
 Philadelphia, PA 19148

and

LOWE'S HOME CENTERS, INC.
 Highway 268 East - East Dock
 North Wilkesboro, NC 28659,

Defendants.

CASE NO.

CIVIL ACTION AT LAW

CIVIL ACTION COMPLAINT

PREMISES LIABILITY

1. Plaintiff, Stephanie Kolokithas Georgopoulos, (hereinafter referred to as "Plaintiff") is an adult individual and citizen of the Commonwealth of Pennsylvania, currently residing at 1427 Knox Road, Wynnewood, Pennsylvania 19096.

2. Defendant, Lowe's Home Centers, LLC, (hereinafter referred to as "Defendant Lowe's LLC"), upon information and reasonable belief, is a corporation organized and existing under the laws of a state other than the Commonwealth of Pennsylvania which regularly and

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continuously conducts business in the City of Philadelphia, County of Philadelphia and Commonwealth of Pennsylvania with an address for service of process at 2106 South Columbus Boulevard, Philadelphia, Pennsylvania 19148.

3. Defendant, Lowe's Home Centers, INC., (hereinafter referred to as "Defendant Lowe's INC."), upon information and reasonable belief, is a corporation organized and existing under the laws of a state other than the Commonwealth of Pennsylvania which regularly and continuously conducts business in the City of Philadelphia, County of Philadelphia and Commonwealth of Pennsylvania with an address for service of process at 2106 South Columbus Boulevard, Philadelphia, Pennsylvania 19148.

4. At all times material hereto, Defendant Lowe's LLC operated, maintained, and/or controlled a home improvement store identified as Lowe's Home Improvement Center located at 1250 Cornerstone Boulevard, Downingtown, Pennsylvania 19018 and exercised exclusive possession, supervision and/or control over the interior and exterior of said premises, including, but not limited to, the outside parking lot, sidewalk, walkway, and/or entranceway for use by store patrons.

5. At all times material hereto, Defendant Lowe's INC. owned and possessed the real estate where the Lowe's Home Improvement Center was located at 1250 Cornerstone Boulevard, Downingtown, Pennsylvania 19018 and was acting and/or failed to act by and through its agents, servants, work persons, and/or employees, within the course and scope of their employment and/or agency.

6. At all times material hereto, Defendants were acting and/or failed to act by and through their agents, servants, work persons, and/or employees, within the course and scope of their employment and/or agency.

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7. At all times material hereto, Defendants had a duty and/or responsibility to maintain, operate and/or control the aforesaid premises and perform their statutory and common law duties in a proper and safe condition so as not to constitute a menace, danger, nuisance, snare and/or trap for business invitees such as Plaintiff who were lawfully and properly upon said premises.

8. On or about February 21, 2014, Plaintiff was a customer who was lawfully and properly upon Defendants' premises when she was caused to slip and fall by reason of a dangerous and hazardous condition in the form of snow and ice on the parking lot surface and its adjoining areas that caused her to sustain serious and permanent personal injuries, the extent of which will be outlined further herein.

9. On the date and time as aforesaid, Defendants, by and through their agents, servants, work persons, and/or employees permitted said premises to be and remain in said dangerous condition, of which Defendants knew and/or should have known existed at the time of said accident.

10. The carelessness and negligence of Defendants consisted, *inter alia*, of the following:

- (a) failing to properly and adequately maintain the property where Plaintiff was caused to suffer injuries;
- (b) causing and/or permitting to exist on the premises a defective and hazardous condition;
- (c) failing to properly and adequately maintain the property so as to prevent the hazardous and dangerous condition in, on, and about said premises;
- (d) failing to warn persons lawfully on the premises of said dangerous and hazardous condition;
- (e) causing and/or permitting a dangerous and hazardous condition to exist which Defendants knew and/or should have known created an unreasonable risk of

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harm to Plaintiff and others;

- (f) failing to warn invitees of the dangerous and hazardous condition in and on the said premises;
- (g) causing, allowing, and permitting to exist the dangerous and hazardous condition so as to constitute a menace, danger, nuisance, and/or trap to invitees such as Plaintiff;
- (h) failing to properly and adequately maintain the parking lot and adjoining areas so that they are safe for business invitees such as Plaintiff;
- (i) failing to clear the parking lot and its adjoining areas of snow and ice that it knew and/or should have known would constitute a danger to business invitees such as Plaintiff;
- (j) permitting and/or failing to prevent business invitees from using said premises which contained the said dangerous and hazardous condition;
- (k) failing to properly inspect the premises for dangerous and hazardous conditions;
- (l) otherwise failing to exercise due care and failing to protect the rights and safety of Plaintiff;
- (m) creating and permitting to exist a foreseeable risk of harm to business invitees such as Plaintiff;
- (n) failing to make said premises reasonably safe;
- (o) failing to properly perform their statutory and common law duties; and
- (p) other violations of the laws of the Commonwealth of Pennsylvania and the ordinances of the local municipality.

11. Due to all of the foregoing, Plaintiff suffered severe and disabling injuries to her back, buttocks, legs and body; skin, muscles, tendons, ligaments, nerves, and tissues of her back, buttocks, legs and body; including, but not limited to, herniated lumbar disc with myelopathy, S1 radiculopathy on the left, S1 myeloradiculopathy, bilateral mid back pain, intervertebral disc disorder with myelopathy requiring L5-S1 microdiscectomy, degenerative disc disease at L5-S1

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with lateral recess stenosis on the left and signal and played changes on the inferior and superior end plates of L5 and S1, cauda equina syndrome, joint tenderness, spasms, nervous shock, aggravation and/or exacerbation of all known and unknown pre-existing medical conditions, serious impairment of bodily functions, severe aches, pains, mental anxiety and anguish and severe shock to her entire nervous system and other injuries, the full extent of which is not yet known.

12. As a result of the aforesaid occurrence, Plaintiff has been compelled in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for medicine and medical attention and may be required to do so for an indefinite period of time in the future, all to her great detriment and loss.

13. As a direct and proximate result of the carelessness and negligence of Defendants as described in the foregoing paragraphs, Plaintiff has been disabled in the past and may continue to be disabled in the future from performing her usual duties, occupations, and avocations with a consequent loss of earnings, earning power and earning potential, all to her great personal and financial detriment and loss.

14. Due to all the foregoing, Plaintiff has suffered physical pain, mental anguish and humiliation, disfigurement and scarring, and loss of life's pleasures and may continue to suffer same for an indefinite period of time in the future.

WHEREFORE, Plaintiff, Stephanie Kolokithas Georgopoulos, demands damages of Defendants, in a sum in excess of Fifty Thousand Dollars (\$50,000.00), together with the costs and disbursements of this action and delay damages.

2016-02-12 09:51

ptcpnt81 2159825395 >> 704 757 0597

P 9/10

LAW OFFICES OF KEITH J. COHEN, ESQUIRE, P.C.

BY:

A handwritten signature in black ink, appearing to read 'Keith J. Cohen', written over a horizontal line.

Keith J. Cohen, Esquire
Attorney for Plaintiff,
Stephanie Kolokithas Georgopoulos

Date: January 30, 2015

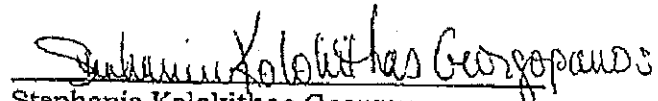
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VERIFICATION

I, Stephanie Kolokithas Georgopoulos, Plaintiff in the above captioned matter, verify that the facts alleged in Plaintiff's Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements made herein are subject to the penalties of 18 PA.C.S. Section 4904 relating to unsworn falsification to authorities.


Stephanie Kolokithas Georgopoulos

DATED: 1-31-15

Case ID: 160200350

MINTZER, SAROWITZ, ZERIS,
LEDVA & MEYERS, LLP
BY: JENNIFER M. HERRMANN,
ESQUIRE
Attorney I.D. No. 315453
Centre Square, West Tower
1500 Market Street
Suite 4100
Philadelphia, PA 19102
(215) 735-7200
MSZL&M File No. 003830.000085

Filed and Attested by the
Office of Judicial Records
26 FEB 2016 12:01 pm
J. OSTROWSKI

Attorney for Defendant,
LOWE'S HOME CENTERS, LLC (i/d/a
LOWE'S HOME CENTERS, INC.)

STEPHANIE KOLOKITHAS
GEORGOPANOS

vs.

LOWE'S HOME CENTERS, LLC AND
LOWE'S HOME CENTERS, INC.

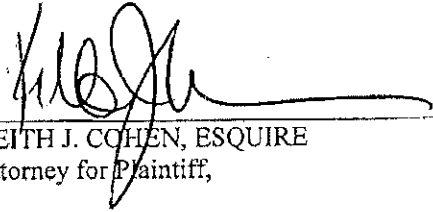
COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. 160200350


STIPULATION

It is hereby stipulated by and between counsel that the defendant has been improperly identified in the Complaint and caption. Therefore, the name of the defendant "LOWE'S HOME CENTERS, INC." is removed from the caption and Complaint and replaced with "LOWE'S HOME CENTERS, LLC".

LAW OFFICES OF KEITH J. COHEN,
ESQUIRE, P.C.

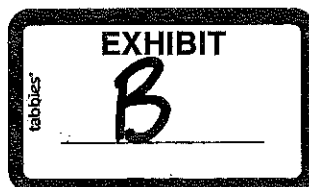
BY: 
KEITH J. COHEN, ESQUIRE
Attorney for Plaintiff,

MINTZER, SAROWITZ, ZERIS,
LEDVA & MEYERS, LLP

BY: 
JENNIFER M. HERRMANN, ESQUIRE
Attorney for Defendant, LOWE'S HOME
CENTERS, LLC (i/d/a LOWE'S HOME
CENTERS, INC.)

BY THE COURT:

J.



Case ID: 160200350

AFFIDAVIT OF SERVICE

CAPTION:

STEPHANIE KOLOKITHAS, et al

VS.

LOWES HOME CENTERS, LLC, et al

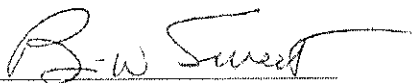
Filed and Attested by the
Clerk of the Court
06 FEB 2016 09:51 am
C. MALVESTUTO
Philadelphia County Court
February Term No. 16-000350

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF MONTGOMERY

I, Brian Sweet hereby depose and state that on February 04, 2016 at 11:50 am, I hand delivered the following documents regarding the above captioned matter upon the defendant identified as **LOWE'S HOME CENTERS, LLC**

- Civil Action Complaint


Service of these documents was made upon Lowe's Home Centers, LLC at the address of 2106 South Columbus Boulevard Philadelphia, PA 19148. The documents were accepted by an employee identified as Maggie, Customer Service Supervisor. Maggie was made aware that these documents were civil court documents regarding the above captioned matter.

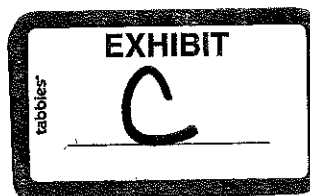
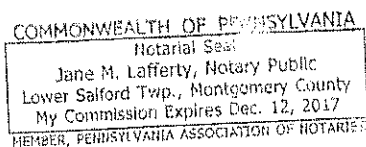

Brian W. Sweet

Being duly sworn according to law, deposes and states that he is a licensed Investigator in The Commonwealth of Pennsylvania, (License# MD-2102-2007); and that the facts herein set forth above are true and correct.

Law Office:
Keith J. Cohen, Esquire
Office Court at Blue Bell
585 Skippack Pike, Suite 200
Keith J. Cohen, Esquire ID# 43561
(267) 708-7701

Sworn and Subscribed
before me on this day
February 4, 2016


Notary Public



Case ID: 160200350